

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 In re:

5 PG&E CORPORATION

6 - and -

7 PACIFIC GAS AND ELECTRIC
8 COMPANY,

9 Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ROY E. MILLER IN
OPPOSITION TO
DECLARATION OF JEREMIAH F.
HALLISEY, ESQ. IN SUPPORT OF
JOINDER OF CERTAIN FIRE VICTIMS
IN WILLIAM B. ABRAMS MOTION TO
DESIGNATE IMPROPERLY
SOLICITED VOTES PURSUANT TO 11
U.S.C. §1125(B) AND 1126(E) AND
BANKRUPTCY RULE 2019**

- 12 ☐ Affects PG&E Corporation
13 ☐ Affects Pacific Gas and Electric Company
14 ☒ Affects both Debtors

15 * All papers shall be filed in the Lead Case,
16 No. 19-30088 (DM).

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 7140

17 **DECLARATION OF ROY E. MILLER**

18 Roy E. Miller declares the following pursuant to 28 U.S.C. § 1746:

19 1. I am an attorney and a partner at Hansen & Miller Law firm in Santa Rosa, CA.

20 2. I currently represent approximately 3,000 clients within the Watts Guerra group
21 concerning the wildfires subject to the proposed settlement.

22 3. My family and I are also clients of Watts Guerra given we lost our home and
23 possessions in the Tubbs Fire.

24 4. Since November, 2017, I've sent out regular updates to my client group. The
25 updates concerned the progress of the litigation, requests for supporting documentation and offers
26 of encouragement given the stress all who were affected by the wildfires were going through.
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1 5. No client of mine and WATTS GUERRA was even given an opportunity to vote
2 prior to March 31, 2020.

3 6. In paragraph 5 of her declaration, POOL writes, "[a]ttached as Exhibit B is a true
4 and correct copy of an email I received at 8:23 AM urging me to accept the Plan." Exhibit B is the
5 first solicitation by WATTS GUERRA, or any lawyer with whom it is working, of a vote on the
6 Plan, and it was emailed together with a transmission of all court-ordered materials, including the
7 Disclosure Statement.
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9 7. I declare under penalty of perjury under the laws of the State of California that the
10 forgoing is true and correct and executed this 11th day of May 2020.
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13 /s/ Roy E. Miller
14 Roy E. Miller
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